



*Consulting Engineers
and Scientists*

PASTOR, BEHLING & WHEELER, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

Tel (512) 671-3434
Fax (512) 671-3446

January 11, 2008
(PBW Project No. 1381)

VIA OVERNIGHT COURIER

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: December 2007 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport,
Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
 - Subtask 6.3 – Laboratory analyses of soil samples collected from 7 locations within off-site Lot 20 (the former commercial marina property west of the Site), 15 locations within the area of the Site south of Marlin Avenue (the South Area), and 7 locations within the area of the Site north of Marlin Avenue (the North Area) were completed. Validation of the data from these analyses was partially completed.
 - Subtask 6.5 – Development and sampling of Zone B monitoring well NE3MW30B was performed. Laboratory analyses of groundwater samples from ten Zone A monitoring wells and NE3MW30B were completed. Laboratory analyses of a soil sample from the boring for NE3MW30B were also completed. Validation of the data from these analyses was partially completed. Water level elevations were measured in Site monitoring wells

and staff gauges on December 3, 2007. Evaluation of groundwater data was performed.

- Subtask 6.7 – Wetlands sediment samples were collected from the 0 to 0.5 foot depth interval at nine locations (3WSED1 through 3WSED9) and from the 1 to 2 foot depth interval at location 2WSED9 as proposed in my November 1, 2007 letter to you, which was approved by your letter dated December 13, 2007. Proposed samples from the 1 to 2 foot depth interval at locations 2WSED8 and 2WSED 10 were not collected as saturated conditions (standing water) were observed at these locations.

- Risk Assessment activities (SOW Paragraphs 37) detailed under Task 7 of the RI/FS Work Plan - data analysis, human health risk evaluation and ecological risk evaluation were partially completed.

2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:

- Water levels measured in Site monitoring wells and calculated water level elevations are provided in Attachment A.
- Unvalidated analytical laboratory reports for the soil sample analyses described above are provided in electronic form on the enclosed DVD.
- Unvalidated analytical laboratory reports for the groundwater sample analyses described above are provided in electronic form on the enclosed DVD.
- The validation report for the Lot 20 soil sample analyses described above is provided in electronic form on the enclosed DVD.
- The updated database, including all data validated through December 31, 2007 is provided in electronic format on the enclosed DVD.

3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:

- RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan (weather and access permitting) including:
 - Subtask 6.3 – Soil investigation – to be continued through soil sample data validation, and data evaluation.
 - Subtask 6.5 – Groundwater/NAPL investigation – to be continued through monitoring well/piezometer installation and development, groundwater sampling and analysis, data validation, and data evaluation.
 - Subtask 6.7 – Sediment investigation – to be continued through sample analyses, data validation, and data evaluation.

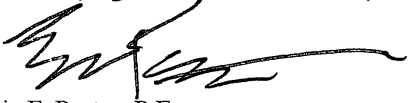
- Risk Assessment activities (SOW Paragraphs 37) detailed under Task 7 of the RI/FS Work Plan – to be continued through data analysis, human health risk evaluation and ecological risk evaluation.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 70% complete. No delays were encountered this month.

Although not required by the UAO, an alternative project schedule was submitted to you on October 18, 2007 in response to your request. This alternative schedule was based on use of a removal action approach for performance of remaining project activities to obtain construction completion by September 30, 2008, coupled with a partial delisting of the Site. A meeting between Respondents and EPA representatives is scheduled for January 16, 2008 to review the objectives of this schedule and discuss mechanisms to move forward with its implementation.

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Robert L. Iuliucci - Sequa Corporation
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP

ATTACHMENT A
WATER LEVEL MEASUREMENTS

December 3, 2007 Water Levels

Well ID	Date	Time	MP ¹ Elevation (ft AMSL ²)	Depth to Water (ft BMP ³)	Water Elevation (ft AMSL)
ND2MW01	12/3/2007	1138	5.09	4.13	0.96
ND3MW02	12/3/2007	1151	6.41	4.46	1.95
ND4MW03	12/3/2007	1057	6.20	3.73	2.47
NE1MW04	12/3/2007	1123	4.90	3.47	1.43
NE3MW05	12/3/2007	1154	6.53	5.03	1.50
NF2MW06	12/3/2007	1158	5.35	3.27	2.08
SB4MW07	12/3/2007	946	7.57	6.14	1.43
SE1MW08	12/3/2007	954	7.54	5.21	2.33
SE6MW09	12/3/2007	1018	7.66	5.74	1.92
SF5MW10	12/3/2007	1006	8.01	6.01	2.00
SF6MW11	12/3/2007	1011	8.11	6.39	1.72
SF7MW12	12/3/2007	1015	7.96	6.44	1.52
SG2MW13	12/3/2007	959	7.71	6.07	1.64
SH7MW14	12/3/2007	1026	8.10	6.43	1.67
SJ1MW15	12/3/2007	1044	5.61	3.47	2.14
SJ7MW16	12/3/2007	1032	7.19	6.51	0.68
SL8MW17	12/3/2007	1038	5.87	4.81	1.06
NB4MW18	12/3/2007	1051	4.96	3.68	1.28
NG3MW19	12/3/2007	1111	5.08	3.29	1.79
OMW20	12/3/2007	1134	4.88	2.84	2.04
OMW21	12/3/2007	1126	5.73	4.86	0.87
SA4MW22	12/3/2007	941	7.79	6.72	1.07
ND4MW24B	12/3/2007	1101	5.70	3.32	2.38
NG3MW25B	12/3/2007	1113	4.91	2.94	1.97
OMW27B	12/3/2007	1129	5.45	4.17	1.28
NC2MW28	12/3/2007	1142	4.76	2.51	2.25
ND3MW29	12/3/2007	1147	5.33	3.27	2.06
NE3MW30B	12/3/2007	1104	6.70	4.78	1.92
MW-1	12/3/2007	NM	6.75	4.21	NM
MW-2	12/3/2007	NM	5.88	3.64	NM
MW-3	12/3/2007	NM	7.23	5.41	NM
HMW-1	12/3/2007	NM	5.15	2.61	NM
HMW-2	12/3/2007	NM	4.69	3.63	NM
HMW-3	12/3/2007	NM	5.20	3.54	NM
BM-1	12/3/2007	1116	3.53	1.49	2.04
BM-2	12/3/2007	1119	3.30	1.29	2.01
BM-3	12/3/2007	951	5.10	4.60	0.50

Notes:

¹ MP = Measurement Point (Top of PVC well casing).

² AMSL = Above Mean Sea Level (NGVD 29).

³ BMP = Below Measurement Point.